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Sent: Friday, March 20, 2020 3:10 PM

To: Wakefield, Jeff <JWakefield@flahertylegal.com>

Cc: Thornton, Joseph C. <Joseph.C.Thornton@wv.gov>; Douglas, Brad T <Brad.T.Douglas@wv.gov>;

Briana J. Marino <Briana.J.Marino@wvago.gov>; Summers, Suzanne Y <Suzanne.Y.Summers@wv.gov>

Subject: Pending document requests

Jeff,

Thanks for speaking with me today about the status of your document requests in the AmerisourceBergen, *et al*, matter. As we discussed, the appropriate officials are in receipt of your letter tapering your original requests and have been evaluating what material would be responsive. However, in light of the COVID-19 crisis, much of our personnel is tasked with immediate issues involving public safety. In addition, some employees are working remotely, which may contribute to delays in the meetings necessary to fully gather and evaluate the information.

I do understand your trial date is set for August, and you have certain discovery deadlines in April. We will continue to strive towards a full production of the requested materials. I just wanted to give you an update of the situation on the ground over here. If your scheduling order changes materially, please advise. Otherwise, please let me know what you consider to be the latest date on which you will need the documents produced under the existing scheduling order.

Thank you for your kind assistance in this matter, and we look forward to hearing from you.

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